

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC, TRIDENT ASSET	)	
MANAGEMENT, INC., MICHAEL	)	
DZIURGOT, individually and as the	)	
representatives of a class of similarly-	)	
situated persons,	)	Civil Action No.: 1:24-cv-20755-DSL-JG
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
ALEBRIJE ENTERTAINMENT LLC,	)	
CRAIG COLE, MATTHEW COLE,	)	
GUSTAVO MONTAUDON, and John	)	
Does 1-10,	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR PLAINTIFFS AVR  
GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., AND MICHAEL DZIURGOT**

The undersigned attorney, Ross M. Good, Esq. of The Good Law Group request that this Honorable Court enter an Order permitting the undersigned to withdraw from the case and from further representation of Plaintiffs AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., MICHAEL DZIURGOT in the above-referenced matter. In support thereof, the undersigned states as follows:

1. On or about February 2024, Plaintiffs retained the undersigned to represent them in the above-captioned case.
2. As a result of irreconcilable differences between undersigned counsel and remaining Plaintiffs' Counsel, undersigned counsel seeks an Order of withdrawal from this Honorable Court.
3. Pursuant to Local Rule 11.1(d)(3)(A), Plaintiffs will continue to be represented by

Alexander N. Loftus, Esq.  
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(ECF. No. 10).

4. Plaintiffs' remaining counsel intends to remain in this matter.
5. This motion is not filed for the purposes of delay and undersigned counsel has taken all steps reasonably practicable to protect the clients' interests.

WHEREFORE, undersigned counsel respectfully requests this Honorable Court enter an Order permitting their withdrawal from the representation of the Plaintiffs in the above-referenced matter and to be relieved of any further responsibility of the handling of this matter. A proposed order is attached hereto and will also be submitted via e-mail to the Court.

Respectfully submitted August 12, 2024

/s/ Ross M. Good  
Ross M. Good – FL Bar No.: 116405

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Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 12, 2024, the foregoing document was filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record registered to receive electronic Notices of Electronic Filing generated by CM/ECF.

By: /s/ Ross M. Good